

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 19-369
)	
)	
LAFON ELLIS)	

MOTION TO EXTEND RESPONSE DATE AND PERMIT OMNIBUS RESPONSE

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant United States Attorney for said district, and respectfully moves for this Court for an extension of time to file its reply to the defendant's Response to the Government's Motion to Quash (Doc. No. 71) and for permitted to file an omnibus response that addresses not only that pleading but also defendant's response to the government's motion to quash.

On August 21, 2020, the Court ordered the government to reply to the defendant's Response to the Government's Motion to Quash (Doc. No. 71) by September 9, 2020. On August 18, 2020, the Court granted the Government's Motion for Extension of Time to File Response to the defendant's Motion to Compel Software Verification Materials and set the response date to October 14, 2020. Many of the issues underlying the Government's Motion to Quash and the defendant's Motion to Compel Software Verification Materials are intertwined and therefore the government submits that it would be more efficient to submit an omnibus pleading that addresses both pleadings.

Wherefore, the government respectfully requests for the response date to the defendant's Response to the Government's Motion to Quash (Doc. No. 71) be set to the same date, October 14, 2020, and that the court permit an omnibus response.

Respectfully submitted,

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s/ Brendan T. Conway
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